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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS ROGER WHITE, JR., and
PATRICIA CAULEY, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendant.

Civil Action No. 17-01775 (MCA) (JSA)

Hon. Madeline Cox Arleo, U.S.D.J.

Hon. Jessica S. Allen, U.S.M.J.

**DECLARATION OF MACK PRESS,
ESQ. IN SUPPORT OF APPLICATION
FOR ADMISSION *PRO HAC VICE* OF
JAVIER BLEICHMAR, LESLEY E.
WEAVER, ANGELICA M. ORNELAS,
AND JOSHUA D. SAMRA**

I, Mack Press, hereby declare:

1. I am the sole proprietor of The Mack Firm and am counsel for Plaintiffs in the above-captioned action. I am personally familiar with the facts set forth in this Declaration.

2. I submit this declaration to the Court in support of Plaintiffs' application for an Order granting attorneys Javier Bleichmar, Lesley E. Weaver, Angelica M. Ornelas, and Joshua D. Samra of Bleichmar Fonti & Auld LLP admission *pro hac vice* in this matter pursuant to Local Civil Rule 101.1(c).

3. I am a member in good standing of the bars of the State of New Jersey, the United States District Court for the District of New Jersey, the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York, and the Supreme Court of the State of New York, Appellate Division, First Judicial Department.

4. On April 26, 2023, counsel for Defendant Samsung Electronics America, Inc. consented to the admission *pro hac vice* of attorneys Javier Bleichmar, Lesley E. Weaver, Angelica M. Ornelas, and Joshua D. Samra of Bleichmar Fonti & Auld LLP in this matter.

5. If the Court grants Plaintiffs' application for the admission *pro hac vice* of Javier Bleichmar, Lesley E. Weaver, Angelica M. Ornelas, and Joshua D. Samra, I will continue to serve as counsel of record in this matter, will review and sign all pleadings, briefs, and other papers filed with the Court, will be present for all appearances before the Court unless previously excused from appearing by the Court, will be responsible for the conduct of this action and for the conduct of attorneys Javier Bleichmar, Lesley E. Weaver, Angelica M. Ornelas, and Joshua D. Samra and will otherwise comply with all the terms and conditions of Local Civil Rule 101.1(c).

6. For the foregoing reasons and those set forth in the Declaration of Javier Bleichmar, the Declaration of Lesley E. Weaver, the Declaration of Angelica M. Ornelas, and the Declaration

of Joshua D. Samra submitted herewith, it is respectfully requested that the Court execute and direct the entry of the attached Order admitting Javier Bleichmar, Lesley E. Weaver, Angelica M. Ornelas, and Joshua D. Samra *pro hac vice* for the purpose of representing Plaintiffs in this litigation.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 26, 2023 in Commack, New York.

By: s/ Mack Press
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